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March 4, 2021

The Honorable Jocelyn G. Boyd
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Docket 2020-247-A - Public Service Commission Review of South Carolina Code
of Regulations Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Dear Ms. Boyd:

Please accept these comments on behalf of the SouthWest Water Utilities¹ in the above referenced docket regarding the Minimum Filing Requirements (“MFR”) circulated by Ms. Ellison on February 26, 2020.

The SouthWest Water utilities believe many of the proposed MFRs are inappropriate for water and wastewater utilities. This is explicitly the case for the cited Florida MFRs entitled “Minimum Filing Requirements for Investor-Owned Electric Utilities”. Florida’s filing requirements vary according to the size of the utility and that state even provides staff-assisted rate cases for small utilities.² For example, these items are inapplicable to a water or wastewater utility:

No.	Item	FL	AR
B-6	Jurisdictional Separation Factors – Rate base	X	x
B-16	Nuclear Fuel Balances	x	
B-18	Fuel Inventory By Plant	x	
C-1	Adjusted Jurisdictional Net Operating Income	X	X
C-4	Jurisdictional Net Operating Income Adjustments	X	X
C-33	Performance Indices	X	X
C-35	Statistical Information	X	X
C-42	Hedging Costs	X	
E-9	Cost of Service-Load Data	X	X

¹ South Carolina Water Utilities-CUC, Inc. Palmetto Utilities, Inc., Palmetto Wastewater Reclamation, LLC, Kiawah Island Utility, Inc., T.J. Barnwell Utility Co., and Harbor Island Utilities, Inc.

² See Florida PUC Reg. 25.30.436, and 25.30.455 attached as Exhibit A.

The Honorable Jocelyn G. Boyd

March 4, 2021

Page 2 of 2

No.	Item	FL	AR
E-11	Development of Coincident and Noncoincident Demands for Cost of Study	X	
E-13A	Revenue from Sale of Electricity by Rate Schedule	X	
E-13d	Revenue by Rate Schedule – lighting Schedule Calculation	X	
E-16	Customers by Voltage Level	X	
E-17	Load Research Data	X	
E-18	Monthly peaks	X	
E-19a	Demand and Energy Losses	X	
E-19b	Energy Losses	X	
E-19c	Demand losses	X	
F-4	NRC Safety Citations	X	
F-5	Forecasting Models	X	
F-6	Forecasting Models-Sensitivity of Output to Changes in Input Data	X	
F-7	Forecasting Models - Historical Data	X	
F-8	Assumption	X	

The SouthWest Water Utilities suggest the Commission separately consider whether new MFRs are required for water and wastewater rate case and use the information provided in those utilities' Annual Reports as a baseline.

Thank you for the opportunity to present these comments.

With best wishes, I am,

Sincerely yours,

s/ Charlie Terreni

Charles L.A. Terreni

c: Counsel of record

Enclosures (1)